

1 BARRY J. PORTMAN  
2 Federal Public Defender  
2 ELIZABETH M. FALK  
3 Assistant Federal Public Defender  
3 450 Golden Gate Avenue  
4 San Francisco, CA 94102  
4 Telephone: (415) 436-7700

5 Counsel for Defendant RAVEN  
6 Specially Appearing for Defendant BLAND

7  
8 IN THE UNITED STATES DISTRICT COURT  
9  
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA, ) No. CR-07-70489 MAG  
12 ) Plaintiff, ) MOTION AND [PROPOSED] ORDER  
13 v. ) ) FOR TEMPORARY MODIFICATION  
14 Patrice RAVEN and Jeanette ) ) OF BAIL CONDITIONS PERMITTING  
15 BLAND, ) ) DEFENDANTS TO TRAVEL TO LAW  
16 ) ) VEGAS  
17 Defendants. ) )  
18 ) Next Date: October 31, 2007 (Judge  
19 ) Chen)  
20 ) Time: 9:30 a.m.  
21 ) Court: Honorable Joseph C. Spero

---

22  
23 Defendants Raven and Bland hereby respectfully request this Court to issue an order modifying  
24 their bail conditions, which would permit the defendants to travel to Las Vegas for plans they  
25 arranged prior to their arrests on this matter. The proposed dates of travel are November 1, 2007  
through November 4, 2007. United States Pretrial Services Officer Hence Williams has been  
contacted by defense counsel about this request, and has no objection to the request. USPSO  
Williams will be provided with an itinerary detailing flight and hotel information. The defendants  
will be back in the district no later than the evening of November 4, 2007.

26 Assistant United States Attorney Allison Marston Danner has been contacted by defense

1 counsel, and has no objection to the request.

2 WHEREFORE, defendants Raven and Bland respectfully request this Court to grant the  
3 temporary modification, and allow the defendants to travel to Las Vegas between November 1, 2007  
4 and November 4, 2007.

5  
6 IT IS SO STIPULATED

7 DATED: 10/22/07 /S/  
8 ELIZABETH M. FALK  
Assistant Federal Public Defender

9  
10 DATED: 10/22/07 /S/  
11 ALLISON MARSTON DANNER  
Assistant United States Attorney

12  
13 [PROPOSED] ORDER

14  
15 GOOD CAUSE SHOWN, it is hereby ORDERED that the bail conditions of Defendants  
16 PATRICE RAVEN and JEANETTE BLAND be temporarily modified to permit them to travel to  
17 Las Vegas on Thursday, November 1, 2007, provided that the defendants return to the Northern  
18 District of California no later than the evening of November 4, 2007.

19  
20  
21 THE HONORABLE JOSEPH C. SPERO  
22 UNITED STATES MAGISTRATE JUDGE  
23  
24  
25  
26

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26